



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10**

1200 Sixth Avenue, Suite 900  
Seattle, WA 98101-3140

OFFICE OF  
ECOSYSTEMS,  
TRIBAL AND PUBLIC  
AFFAIRS

June 17, 2013

Jennie O'Connor Card, Team Leader  
Mt. Hood Meadows Ski Resort Parking Improvements  
6780 Highway 35  
Parkdale, Oregon 97041

Re: U.S. Environmental Protection Agency comments on the Mt. Hood National Forest Draft  
Environmental Impact Statement for the Mt. Hood Meadows Ski Resort Parking Improvements.  
(EPA Region 10 Project Number: 11-4114-AFS).

Dear Ms. O'Connor Card,

This review was conducted in accordance with our responsibilities under the National Environmental Policy Act and Section 309 of the Clean Air Act. Section 309 specifically directs the EPA to review and comment in writing on the environmental impacts associated with all major federal actions. Under our Section 309 authority, we consider the expected environmental impacts, and the adequacy of the EIS in meeting procedural and public disclosure requirements of NEPA.

The draft EIS analyzes the effects of six alternatives to meet the need for additional parking, and improved traffic flow and public and customer safety at Mt. Hood Meadows Ski Resort. The Preferred Alternative would impact 19.0 acres of Winter Recreation Area lands within the Mt. Hood Meadows Ski Resort permit area – including 9.4 acres of clearing for the proposed Twilight Parking Lot and associated storm water management and snow storage areas, and 2.5 acres of clearing for the Twilight Equipment Maintenance Yard.

In our August 4, 2011 scoping comments, we recommended that the EIS provide information on how the proposed action is consistent with the 1997 Mt. Hood Meadows Ski Area Master Plan and Record of Decision. Our scoping comments also included recommendations on water quality, air quality, invasive weeds, habitat, roads, climate change effects, transportation, monitoring and adaptive management. The draft EIS's discussion of master plan consistency for all alternatives is responsive to our master plan recommendation, and other information throughout the draft EIS is responsive to our other scoping recommendations. Overall, we believe the draft EIS adequately sets forth the environmental impacts of the preferred alternative and those alternatives reasonably available to the project or action.

Below, we provide comments on the draft EIS's direct responsiveness to one of our water quality recommendations, describe our remaining environmental concerns with the project, and provide a recommendation for the final EIS's traffic monitoring program.

**Water Quality**

We appreciate the Forest's thoughtful water quality analysis. The EIS is responsive to our suggestions for information on 303(d) listed streams and relevant Total Maximum Daily Loads.

We also appreciate and support all of the Project Design Criteria for Aquatics, especially PDC A-16.

The Twilight Parking Lot and Maintenance Shed should utilize storm water design methodology and treatment methods outlined in the EPA document "Technical Guidance on Implementing Runoff Requirements for Federal Projects under Section 438 of the Energy Independence and Security Act" EPA 841-B-09-001 for treatment of storm water. These designs should be reviewed by appropriate Forest Service staff prior to implementation.<sup>1</sup>

PDC A-16 is directly responsive to our scoping suggestion to maintain and/or restore "...the predevelopment hydrology of the property with regard to the temperature, rate, volume, and duration of flow." as detailed in EPA 841-B-09-001. We recognize this PDC as going above and beyond minimum water quality requirements.

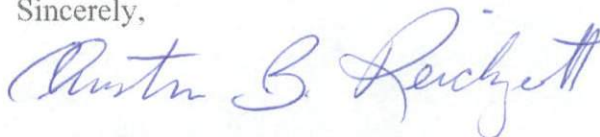
#### **EPA Rating, Master Plan Consistency, and Transportation Demand Management**

We do have concerns regarding the project's potential, unavoidable impacts to wildlife habitat (reduction of suitable habitat for Northern spotted owls), habitat connectivity (impacts to east west migration routes for deer and elk), and disturbance to Riparian Reserves (removal of 400 linear feet of riparian vegetation or increased risk of sedimentation from snow removal limitations). Therefore, we are assigning the rating Environmental Concerns – Adequate (EC-1) to this draft EIS. A copy of our rating system is enclosed.

To help ensure that further adverse environmental impacts from parking lot proposals which are inconsistent with the 1997 master plan are avoided, we recommend that the Forest work with Mt. Hood Meadows, the Oregon Department of Transportation and others to increase the effectiveness of transportation demand management efforts. Consider, for example, incorporating additional decision thresholds (e.g. targets for skier/vehicle proportions) and management responses (e.g. such as increased bus subsidies or preferential parking for carpools) into the appropriate action-forcing documents (e.g. annual operating permits, Oregon Department of Transportation monitoring requirements, NEPA project design criteria).

Thank you for this opportunity to comment and if you have questions, please contact me at (206) 553-1601 or by electronic mail at [reichgott.christine@epa.gov](mailto:reichgott.christine@epa.gov), or you may contact Erik Peterson of my staff at (206) 553-6382 or by electronic mail at [peterson.erik@epa.gov](mailto:peterson.erik@epa.gov).

Sincerely,



Christine B. Reichgott, Manager  
Environmental Review and Sediment Management Unit

Enclosure

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<sup>1</sup> DEIS, p. 2-31

**U.S. Environmental Protection Agency Rating System for  
Draft Environmental Impact Statements  
Definitions and Follow-Up Action\***

**Environmental Impact of the Action**

**LO – Lack of Objections**

The U.S. Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

**EC – Environmental Concerns**

EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

**EO – Environmental Objections**

EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

**EU – Environmentally Unsatisfactory**

EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

**Adequacy of the Impact Statement**

**Category 1 – Adequate**

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

**Category 2 – Insufficient Information**

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

**Category 3 – Inadequate**

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

\* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987.